

SCHREIER & WACHSMAN, LLP  
David M. Schreier (DS-2112)  
Attorneys for Plaintiff  
Sean Finnegan  
240 Madison Avenue, 8<sup>th</sup> Floor  
New York, New York 10016  
212-889-0686

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X	:	
SEAN FINNEGAN,	:	
	:	
Plaintiff,	:	1:17-cv-4424
	:	
-against-	:	
	:	
LONG ISLAND POWER AUTHORITY,	:	
NATIONAL GRID ELECTRIC	:	
SERVICES LLC,	:	
NATIONAL GRID USA SERVICE	:	
COMPANY INC.,	:	COMPLAINT
NATIONAL GRID SERVICES INC.,	:	<u>WITH JURY DEMAND</u>
PSEG LONG ISLAND LLC	:	
(a subsidiary of Public	:	
Service Enterprise Group, Inc.),	:	
INCORPORATED VILLAGE OF LAWRENCE,	:	
TOWN OF HEMPSTEAD,	:	
COUNTY OF NASSAU,	:	
VERIZON NEW YORK, INC.,	:	
CSC HOLDINGS, LLC,	:	
CABLEVISION SYSTEMS	:	
LONG ISLAND CORPORATION,	:	
ASPLUNDH TREE EXPERT CO.,	:	
SAMUEL SHORE,	:	
TRACY SHORE, and	:	
ALTICE USA, INC.,	:	
	:	
Defendants.	:	
-----X	:	

Plaintiff **SEAN FINNEGAN** by his attorneys SCHREIER &  
WACHSMAN, LLP, hereby files this Complaint against Defendants and  
alleges as follows:

### INTRODUCTION

1. On September 6, 2016, Plaintiff **SEAN FINNEGAN**, then age 39, was lawfully driving/riding his motorcycle on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, in the Village of Lawrence, Town of Hempstead, County of Nassau and State of New York when he struck a downed, low hanging power line (wire), cable, telephone line (wire) or similar wire which was strewn across Meadow Lane at the aforementioned location causing Plaintiff **SEAN FINNEGAN** and his motorcycle to crash into a power pole. Plaintiff **SEAN FINNEGAN** sustained severe personal injuries, conscious pain and suffering, multiple fractures, multiple surgical interventions, multiple hospitalizations, multiple deformities, emotional distress, past, present and future medical bills and loss of income, the extent of Plaintiff **SEAN FINNEGAN's** injuries are not fully known at this time. Plaintiff **SEAN FINNEGAN** is totally disabled and unable to return to work as an ironworker.

### THE PARTIES

2. The Plaintiff, **SEAN FINNEGAN**, is a citizen of the State of Vermont residing at 19 Rist Road, Wilmington, Vermont 05363.

3. At all times mentioned herein, the Defendant **LONG ISLAND POWER AUTHORITY** is a non-profit municipal electric provider organized and existing under and pursuant to the laws of the State of New York, pursuant to Public Authorities Law, and maintains its principal offices at 333 Earle Ovington Boulevard, Uniondale, New York 11553.

4. At all times mentioned herein, the Defendant **NATIONAL GRID ELECTRIC SERVICES LLC**, (referred to hereinafter, collectively with Defendants **NATIONAL GRID USA SERVICE COMPANY, INC.**, and **NATIONAL GRID SERVICES, INC.**, as "**NATIONAL GRID**"), was and still is a domestic limited liability company organized and existing under the laws of the State of New York having its principal place of business at 175 East Old Country Road, Hicksville, New York 11801.

5. At all times mentioned herein, and at the time of the occurrences herein, the Defendant **NATIONAL GRID ELECTRIC SERVICES, LLC** (referred to hereinafter, collectively with Defendants **NATIONAL GRID USA SERVICE COMPANY, INC.**, and **NATIONAL GRID SERVICES, INC.**, as "**NATIONAL GRID**"), was authorized to do business in New York, and was in fact doing business in New York.

6. At all times mentioned herein, the Defendant **NATIONAL GRID USA SERVICE COMPANY, INC.**, (referred to hereinafter, collectively with Defendants **NATIONAL GRID ELECTRIC SERVICES, LLC** and **NATIONAL GRID SERVICES, INC.**, as "**NATIONAL GRID**") was and still is a foreign business corporation organized and existing under the laws of the State of Massachusetts having its principal place of business at 40 Sylvan Road, Waltham, Massachusetts 02451.

7. At all times mentioned herein, and at the time of the occurrences herein, the Defendant **NATIONAL GRID USA SERVICE COMPANY, INC.**, (referred to hereinafter, collectively with Defendants **NATIONAL GRID ELECTRIC SERVICES, LLC** and **NATIONAL GRID SERVICES, INC.**, as "**NATIONAL GRID**"), was authorized to do business in New York, and was in fact doing business in New York.

8. At all times mentioned herein, the Defendant **NATIONAL GRID SERVICES, INC.**, (referred to hereinafter, collectively with Defendants **NATIONAL GRID ELECTRIC SERVICES, LLC** and **NATIONAL GRID USA SERVICE COMPANY, INC.**, as "**NATIONAL GRID**"), was and still is a foreign business corporation organized and existing under the laws of the State of Delaware having its principal place of business at One Metrotech Center, Brooklyn, New York 11201.

9. At all times mentioned herein and at the time of the occurrences herein, the Defendant **NATIONAL GRID SERVICES, INC.**, (referred to hereinafter, collectively with Defendants **NATIONAL GRID ELECTRIC SERVICES, LLC** and **NATIONAL GRID USA SERVICE COMPANY, INC.**, as "**NATIONAL GRID**"), was authorized to do business in New York, and was in fact doing business in New York.

10. At all times mentioned herein, the Defendant **PSEG LONG ISLAND, LLC** was and still is a subsidiary of Public Service Enterprise Group, Inc. ("**PSEG**"), the subsidiary was and still is a foreign business corporation organized and existing under the laws of the State of New Jersey having its principal place of business at 80 Park Plaza, Newark, New Jersey.

11. At all times mentioned herein, the Defendant **PSEG LONG ISLAND, LLC** a subsidiary of Public Service Enterprise Group, Inc. ("**PSEG**"), was and still is a domestic limited liability company organized and existing under the laws of the State of New York having its principal place of business at 33 Earle Ovington Boulevard, Uniondale, New York.

12. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **PSEG LONG ISLAND, LLC** a subsidiary of Public Service Enterprise Group, Inc., ("**PSEG**"), was authorized to do business in New York, and was in fact doing business in New York.

13. At all times mentioned herein, the Defendant **INCORPORATED VILLAGE OF LAWRENCE** ("**VILLAGE OF LAWRENCE**"), was and still is a public municipality duly authorized and existing under and by virtue of the laws of the State of New York and maintains its offices at 196 Central Avenue, Lawrence, New York 11559.

14. At all times mentioned herein, the Defendant **TOWN OF HEMPSTEAD**, was and still is a public municipality duly authorized and existing under and by virtue of the laws of the State of New York and maintains its offices at 1 Washington Street, Hempstead, New York 11550.

15. At all times mentioned herein, the Defendant **COUNTY OF NASSAU**, was and still is a public municipality duly authorized and existing under and by virtue of the laws of the State of New York and maintains its offices at 1 West Street, Mineola, New York 11501.

16. At all times mentioned herein, the Defendant **VERIZON NEW YORK INC.**, was and still is a domestic business corporation duly organized and existing under the laws of the State of New York having its principal place of business at 140 West Street, New York, New York 10007.

17. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **VERIZON NEW YORK INC.**, was authorized to do business in New York, and was in fact doing business in New York.

18. At all times mentioned herein, the Defendant **CSC HOLDINGS, LLC** was and still is a foreign limited liability company duly organized and existing under the laws of the State of Delaware having its principal place of business at 1111 Stewart Avenue, Bethpage, New York 11714.

19. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **CSC HOLDINGS, LLC**, was authorized to do business in New York, and was in fact doing business in New York.

20. At all times mentioned herein, the Defendant **CABLEVISION SYSTEMS LONG ISLAND CORPORATION**, was and still is a domestic business corporation duly organized and existing under the laws of the State of New York having its principal place of business at 1111 Stewart Avenue, Bethpage, New York 11714.

21. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **CABLEVISION SYSTEMS LONG ISLAND CORPORATION**, was authorized to do business in New York, and was in fact doing business in New York.

22. At all times mentioned herein, the Defendant **ASPLUNDH TREE EXPERT CO.**, ("**ASPLUNDH**") was and still is a foreign business corporation duly organized and existing under the laws of the State of Pennsylvania having its principal place of business at 708 Blair Mill Road, Willow Grove, Pennsylvania 19006.

23. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **ASPLUNDH TREE EXPERT CO.**, ("**ASPLUNDH**") was authorized to do business in New York, and was in fact doing business in New York.



24. The Defendant, **SAMUEL SHORE** is a citizen of the State of New York residing at 315 Marbridge Road, Lawrence, New York 11559.

25. The Defendant, **TRACY SHORE** is a citizen of the State of New York residing at 315 Marbridge Road, Lawrence, New York 11559.

26. At all times mentioned herein, the Defendant **ALTICE USA, INC.** ("**ALTICE**"), was and still is a foreign business corporation duly organized and existing under the laws of the State of Delaware having its principal place of business at 1111 Stewart Avenue, Bethpage, New York 11714.

27. At all times mentioned herein, and at the time of the occurrence herein, the Defendant **ALTICE USA, INC.**, ("**ALTICE**") was authorized to do business in New York, and was in fact doing business in New York.

#### JURISDICTION AND VENUE

28. This Court has subject matter jurisdiction based upon diversity of citizenship pursuant to 28 USC §1332 and the matter in controversy exceeds the sum of SEVENTY FIVE THOUSAND DOLLARS (\$75,000.00) exclusive of interest and costs.

29. Venue is proper in this district because one or more of the Defendants are subject to personal jurisdiction in this district at the time this action was commenced pursuant to 28 USC §1391.

THE CAUSE OF ACTION

30. At all times mentioned herein, the property known as 315 Marbridge Road, Lawrence, New York was a single family dwelling in the Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

31. At all times mentioned herein and prior thereto, Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York, was and still are public thoroughfares in common use by residents of the State of New York and others.

32. At all times mentioned herein, there existed a downed, low hanging power line (wire), cable, telephone line (wire) or similar wire strewn across Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

33. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** owned, managed, operated and controlled a motorcycle bearing Vermont license plate number ML735 for the year 2016.

34. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was the owner and operator of a certain motorcycle bearing Vermont license plate number ML735 for the year 2016, which was operated within the State of New York on September 6, 2016.

35. On or about the 6<sup>th</sup> day of September 2016, the aforesaid motorcycle owned and operated by Plaintiff **SEAN FINNEGAN** was operated, managed and controlled on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

36. On or about October 13, 2016, Plaintiff caused a Notice of Claim to be served upon Defendant **LONG ISLAND POWER AUTHORITY**, and said notice was served within ninety (90) days of the occurrence herein.

37. More than thirty (30) days have elapsed since the presentation of said Notice of Claim, and said claim remains unadjusted and Defendant LONG ISLAND POWER AUTHORITY has wholly refused, failed and neglected to make any adjustments of same.

38. Oral examination of Plaintiff was not noticed by Defendant LONG ISLAND POWER AUTHORITY.

39. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

40. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

41. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

42. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

43. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

44. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

45. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

46. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

47. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

48. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

49. On or about September 6, 2016, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be, become, and remain in a dangerous and defective condition.

50. At all times mentioned herein, there existed power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

51. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

52. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

53. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



54. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

55. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

56. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

57. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments inspected the

aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

58. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

59. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

60. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

61. On or about September 6, 2016, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau to be, become, and remain in a dangerous and defective condition.

62. At all times mentioned herein, there existed a tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

63. At all times mentioned herein, there existed a tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

64. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

65. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

66. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

67. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

68. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

69. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

70. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

71. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

72. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

73. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

74. On or about September 6, 2016, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

75. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

76. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

77. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

78. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

79. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



80. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

81. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

82. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

83. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

84. On or about September 6, 2016, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line and poles located in front of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

85. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

86. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

87. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

88. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

89. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments inspected the

aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

90. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

91. On or about September 6, 2016, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

92. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

93. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

94. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

95. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

96. At all times mentioned herein and prior thereto, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments inspected the

aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

97. At all times mentioned herein and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

98. On or about September 6, 2016, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

99. At all times mentioned hereinafter, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of

the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

100. At all times mentioned hereinafter, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

101. At all times mentioned hereinafter, Defendant LONG ISLAND POWER AUTHORITY, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or

similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

102. At all times mentioned hereinafter, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

103. At all times mentioned hereinafter, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was under a duty to



operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

104. At all times mentioned hereinafter, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

105. At all times mentioned hereinafter, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

106. At all times hereinafter mentioned, and prior thereto, Defendant **LONG ISLAND POWER AUTHORITY**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

107. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be

placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

108. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

109. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

110. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located

on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

111. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York..

112. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

113. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire

located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

114. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

115. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

116. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or

similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

117. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

118. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

119. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles

located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

120. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

121. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

122. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

123. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

124. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

125. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



126. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

127. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

128. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

129. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

130. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

131. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

132. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

133. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

134. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

135. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

136. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

137. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

138. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

139. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

140. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

141. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

142. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

143. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

144. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

145. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

146. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

147. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

148. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

149. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



150. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

151. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

152. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

153. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

154. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

155. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

156. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to

the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

157. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

158. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

159. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

160. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

161. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

162. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

163. At all times mentioned herein and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to

the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

164. On or about September 6, 2016, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

165. At all times mentioned hereinafter, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

166. At all times mentioned hereinafter, Defendant NATIONAL GRID, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

167. At all times mentioned hereinafter, Defendant NATIONAL GRID, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

168. At all times mentioned hereinafter, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

169. At all times mentioned hereinafter, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

170. At all times mentioned hereinafter, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

171. At all times mentioned hereinafter, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.



172. At all times hereinafter mentioned, and prior thereto, Defendant **NATIONAL GRID**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

173. At all times mentioned herein, Defendant **PSEG** derived substantial revenue from engaging in business in the State of New York.

174. At all times mentioned herein, Defendant **PSEG** expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

175. At all times mentioned herein and prior thereto, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

176. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

177. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

178. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

179. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

180. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

181. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

182. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

183. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

184. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

185. On or about September 6, 2016, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

186. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

187. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

188. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

189. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

190. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

191. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line

(wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

192. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

193. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

194. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

195. At all times mentioned herein and prior thereto, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

196. On or about September 6, 2016, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

197. At all times mentioned herein and prior thereto, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



198. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

199. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

200. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

201. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

202. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

203. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

204. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

205. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

206. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

207. On or about September 6, 2016, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

208. At all times mentioned herein and prior thereto, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New.

209. At all times mentioned herein and prior thereto, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

210. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

211. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

212. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

213. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

214. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

215. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

216. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

217. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

218. On or about September 6, 2016, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

219. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

220. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

221. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

222. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



223. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

224. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

225. On or about September 6, 2016, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

226. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located

in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

227. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

228. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

229. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

230. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

231. At all times mentioned herein and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

232. On or about September 6, 2016, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

233. At all times mentioned hereinafter, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

234. At all times mentioned hereinafter, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

235. At all times mentioned hereinafter, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

236. At all times mentioned hereinafter, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

237. At all times mentioned hereinafter, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

238. At all times mentioned hereinafter, Defendant **PSEG**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

239. At all times mentioned hereinafter, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

240. At all times hereinafter mentioned, and prior thereto, Defendant PSEG, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

241. On or about October 24, 2016, Plaintiff caused a Notice of Claim to be served upon Defendant **VILLAGE OF LAWRENCE**, and said notice was served within ninety (90) days of the occurrence herein.

242. More than thirty (30) days have elapsed since the presentation of said Notice of Claim, and said claim remains unadjusted and Defendant **VILLAGE OF LAWRENCE** has wholly refused, failed and neglected to make any adjustments of same.

243. Prior to the commencement of this action a statutory 50(h) hearing of the Plaintiff was held on February 1, 2017 by Defendant **VILLAGE OF LAWRENCE**.

244. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

245. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



246. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

247. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

248. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

249. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

250. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

251. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

252. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

253. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

254. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

255. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

256. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

257. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

258. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

259. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

260. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

261. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid

power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

262. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

263. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

264. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

265. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

266. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

267. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

268. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

269. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

270. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



271. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

272. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

273. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

274. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

275. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

276. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

277. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

278. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

279. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

280. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

281. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

282. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

283. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

284. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

285. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

286. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

287. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

288. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line and poles located in front of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

289. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

290. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

291. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

292. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

293. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

294. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

295. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.



296. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

297. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

298. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

299. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid

tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

300. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

301. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

302. On or about September 6, 2016, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Lawrence, New York to be, become, and remain in a dangerous and defective condition.

303. At all times mentioned herein, there existed a roadway known as Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

304. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid roadway.

305. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid roadway.

306. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid roadway.

307. At all times mentioned herein and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid roadway.

308. At all times mentioned herein and prior thereto, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid roadway.

309. At all times mentioned herein and prior thereto, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid roadway.

310. At all times mentioned herein and prior thereto, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid roadway

311. At all times mentioned herein and prior thereto, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid roadway.

312. At all times mentioned herein and prior thereto, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid roadway.

313. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

314. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

315. At all times mentioned hereinafter, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

316. At all times mentioned hereinafter, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

317. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

318. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

319. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

320. At all times mentioned hereinafter, Defendant VILLAGE OF LAWRENCE, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid roadway on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.



321. At all times mentioned hereinafter, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly failed to provide appropriate and sufficient illumination on Meadow Lane, about twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

322. At all times mentioned hereinafter, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid illumination or lack of illumination on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

323. At all times hereinafter mentioned, and prior thereto, Defendant **VILLAGE OF LAWRENCE**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Laws.

324. On or about October 13, 2016, Plaintiff caused a Notice of Claim to be served upon Defendant **TOWN OF HEMPSTEAD**, and said notice was served within ninety (90) days of the occurrence herein.

325. More than thirty (30) days have elapsed since the presentation of said Notice of Claim, and said claim remains unadjusted and Defendant **TOWN OF HEMPSTEAD** has wholly refused, failed and neglected to make any adjustments of same.

326. Prior to the commencement of this action, a statutory 50(h) hearing of Plaintiff was not noticed by Defendant **TOWN OF HEMPSTEAD** and therefore waived.

327. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

328. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

329. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

330. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

331. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

332. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

333. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

334. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

335. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

336. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

337. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

338. On or about September 6, 2016, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

339. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

340. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

341. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

342. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

343. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid

power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

344. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

345. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

346. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



347. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

348. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

349. On or about September 6, 2016, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

350. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

351. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

352. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

353. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

354. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

355. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

356. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

357. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

358. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

359. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

360. On or about September 6, 2016, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

361. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

362. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

363. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

364. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

365. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

366. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

367. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

368. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

369. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

370. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



371. On or about September 6, 2016, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line and poles located in front of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

372. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

373. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

374. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid

tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

375. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

376. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

377. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

378. On or about September 6, 2016, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

379. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

380. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

381. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

382. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

383. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

384. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to

the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

385. On or about September 6, 2016, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Lawrence, New York to be, become, and remain in a dangerous and defective condition.

386. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid roadway.

387. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid roadway.

388. At all times mentioned herein and prior thereto, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid roadway.

389. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid roadway.

390. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid roadway.

391. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid roadway.

392. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid roadway.

393. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid roadway.

394. At all times mentioned herein and prior thereto, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid roadway.

395. At all times mentioned hereinafter, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

396. At all times mentioned hereinafter, Defendant TOWN OF HEMPSTEAD, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from

traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

397. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

398. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper



and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

399. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

400. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe,

proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

401. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

402. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid roadway on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State

of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

403. At all times mentioned herein, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly failed to provide appropriate and sufficient illumination on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, County of Nassau and State of New York.

404. At all times mentioned hereinafter, Defendant **TOWN OF HEMPSTEAD**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid illumination or lack of illumination on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

405. At all times hereinafter mentioned, and prior thereto, Defendant TOWN OF HEMPSTEAD was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Laws.

406. On or about October 13, 2016, Plaintiff caused a Notice of Claim to be served upon Defendant COUNTY OF NASSAU, and said notice was served within ninety (90) days of the occurrence herein.

407. More than thirty (30) days have elapsed since the presentation of said Notice of Claim, and said claim remains unadjusted and Defendant COUNTY OF NASSAU, has wholly refused, failed and neglected to make any adjustments of same.

408. Prior to the commencement of this action, a statutory 50(h) hearing of Plaintiff was not noticed by Defendant COUNTY OF NASSAU and therefore waived.

409. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of

Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

410. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

411. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

412. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge

Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

413. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

414. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

415. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of

Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

416. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

417. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

418. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south

of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

419. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

420. On or about September 6, 2016, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

421. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles to



be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

422. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

423. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

424. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

425. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

426. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

427. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

428. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power

line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

429. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

430. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

431. On or about September 6, 2016, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and

State of New York to be, become, and remain in a dangerous and defective condition.

432. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

433. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

434. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

435. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

436. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

437. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

438. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

439. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

440. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

441. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

442. On or about September 6, 2016, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

443. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

444. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

445. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

446. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



447. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

448. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

449. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

450. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

451. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

452. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

453. On or about September 6, 2016, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line and poles located in front of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

454. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

455. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

456. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid

tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

457. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

458. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

459. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

460. On or about September 6, 2016, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

461. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

462. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

463. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

464. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

465. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

466. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to

the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

467. On or about September 6, 2016, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Lawrence, New York to be, become, and remain in a dangerous and defective condition.

468. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid roadway.

469. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid roadway.

470. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid roadway.

471. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid roadway.

472. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid roadway.

473. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid roadway.

474. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid roadway.

475. At all times mentioned herein and prior thereto, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid roadway.



476. At all times mentioned herein and prior thereto, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid roadway.

477. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

478. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from

traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

479. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

480. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper

and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

481. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

482. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe,

proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

483. At all times mentioned hereinafter, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

484. At all times mentioned hereinafter, Defendant COUNTY OF NASSAU, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid roadway on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State

of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

485. At all times mentioned herein, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly failed to provide appropriate and sufficient illumination on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

486. At all times mentioned hereinafter, Defendant **COUNTY OF NASSAU**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid illumination or lack of illumination on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

487. At all times hereinafter mentioned, and prior thereto, Defendant **COUNTY OF NASSAU**, was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Laws.

488. At all times mentioned herein, Defendant **VERIZON NEW YORK, INC.**, derived substantial revenue from engaging in business in the State of New York.

489. At all times mentioned herein, Defendant **VERIZON NEW YORK, INC.**, expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

490. At all times mentioned herein and prior thereto, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

491. At all times mentioned herein and prior thereto, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power

line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

492. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

493. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

494. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid

power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

495. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

496. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

497. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power



line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

498. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

499. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

500. On or about September 6, 2016, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and

permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

501. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

502. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

503. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid

power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

504. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

505. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

506. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

507. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

508. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

509. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

510. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised repairs to the

aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

511. On or about September 6, 2016, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

512. At all times mentioned herein and prior thereto, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

513. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

514. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

515. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

516. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

517. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

518. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

519. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

520. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

521. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



522. On or about September 6, 2016, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

523. At all times mentioned herein and prior thereto, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

524. At all times mentioned herein and prior thereto, Defendant **VERIZON NEW YORK, INC.**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

525. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

526. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

527. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

528. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

529. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

530. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

531. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

532. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

533. On or about September 6, 2016, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

534. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

535. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

536. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

537. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village

of Lawrence, Town of Hempstead, County of Nassau and State of New York.

538. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

539. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

540. On or about September 6, 2016, Defendant VERIZON NEW YORK, INC. its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

541. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

542. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

543. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

544. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid

tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

545. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

546. At all times mentioned herein and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

547. On or about September 6, 2016, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead,



County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

548. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

549. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person

lawfully thereupon would be caused to sustain personal injuries and/or damages.

550. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

551. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly

using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

552. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

553. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly

using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

554. At all times mentioned hereinafter, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

555. At all times hereinafter mentioned, and prior thereto, Defendant VERIZON NEW YORK, INC., its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

556. At all times mentioned herein, Defendant CSC HOLDINGS, LLC, derived substantial revenue from engaging in business in the State of New York.

557. At all times mentioned herein, Defendant CSC HOLDINGS, LLC, expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

558. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

559. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

560. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

561. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

562. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

563. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

564. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

565. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

566. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

567. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

568. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.



569. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

570. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

571. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

572. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power

line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

573. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

574. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

575. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

576. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

577. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

578. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

579. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

580. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

581. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

582. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

583. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

584. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

585. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

586. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

587. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

588. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

589. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

590. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

591. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New.

592. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

593. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



594. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

595. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

596. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

597. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

598. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

599. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

600. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

601. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

602. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

603. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

604. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

605. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

606. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree

located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

607. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

608. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

509. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

610. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

611. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

612. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

613. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree

located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

614. At all times mentioned herein and prior thereto, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

615. On or about September 6, 2016, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

616. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315

Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

617. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

618. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in



front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

619. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

620. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in

front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

621. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

622. At all times mentioned hereinafter, Defendant CSC HOLDINGS, LLC, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar

wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

623. At all times hereinafter mentioned, and prior thereto, Defendant **CSC HOLDINGS, LLC**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

624. At all times mentioned herein, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, derived substantial revenue from engaging in business in the State of New York.

625. At all times mentioned herein, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

626. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

627. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

628. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

629. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

630. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

631. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

632. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

633. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

634. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

635. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

636. On or about September 6, 2016, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

637. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on Meadow Lane and Marbridge

Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

638. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

639. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

640. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road,



Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

641. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

642. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

643. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and

Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

644. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

645. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

646. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow

Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

647. On or about September 6, 2016, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

648. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

649. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or

similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

650. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

651. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

652. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line

(wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

653. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

654. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

655. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or

similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

656. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

657. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

658. On or about September 6, 2016, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire),

cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

659. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New.

660. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION** its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

661. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments

maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

662. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

663. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

664. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments



supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

665. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

666. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

667. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments

repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

668. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

669. On or about September 6, 2016, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

670. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

671. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

672. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

673. At all times mentioned herein and prior thereto, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments

supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

674. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

675. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

676. On or about September 6, 2016, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of

Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

677. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

678. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

679. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

680. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION** its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

681. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

682. At all times mentioned herein and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

683. On or about September 6, 2016, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly

allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

684. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

685. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful

fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

686. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

687. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road,



Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

688. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

689. At all times mentioned hereinafter, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or

similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

690. At all times mentioned hereinafter, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

691. At all times hereinafter mentioned, and prior thereto, Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION** its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence

Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

692. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.**, derived substantial revenue from engaging in business in the State of New York.

693. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.**, expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

694. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **LONG ISLAND POWER AUTHORITY**.

695. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **NATIONAL GRID**.

696. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **PSEG**.

697. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **VILLAGE OF LAWRENCE**.

698. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **TOWN OF HEMPSTEAD**.

699. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **COUNTY OF NASSAU**.

700. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **VERIZON NEW YORK, INC.**

701. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **CSC HOLDINGS, LLC**.

702. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **CABLEVISION SYSTEM OF LONG ISLAND CORPORATION**.

703. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **SAMUEL SHORE**.

704. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **TRACY SHORE**.

705. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid

power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

706. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

707. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

708. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

709. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

710. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance of the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

711. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

712. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

713. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

714. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

715. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid



power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

716. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

717. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance of the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

718. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire poles located on Meadow Lane

and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

719. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

720. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

721. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

722. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

723. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

724. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance the power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

725. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

726. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

727. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

728. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

729. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

730. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

731. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance of the power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

732. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

733. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

734. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

735. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

736. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

737. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree

located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

738. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance of the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

739. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

740. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



741. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

742. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

743. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

744. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

745. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance of the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

746. On or about September 6, 2016, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

747. At all times mentioned hereinafter, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the

roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

748. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

749. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully

and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

750. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

751. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully

and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

752. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

753. At all times mentioned hereinafter, Defendant ASPLUNDH TREE EXPERT CO., its agents, servants, employees, associates, agencies and/or departments was under a duty to control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that

no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

754. At all times hereinafter mentioned, and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

755. At all times mentioned herein, Defendant **LONG ISLAND POWER AUTHORITY** is vicariously liable for the injuries and damages caused by the negligence of Defendant **ASPLUNDH TREE EXPERT CO.**

756. At all times mentioned herein, Defendant **NATIONAL GRID** is vicariously liable for the injuries and damages caused by the negligence of Defendant **ASPLUNDH TREE EXPERT CO.**

757. At all times mentioned herein, Defendant **PSEG** is vicariously liable for the injuries and damages caused by the negligence of Defendant **ASPLUNDH TREE EXPERT CO.**

758. At all times mentioned herein, Defendant **VILLAGE OF LAWRENCE** is vicariously liable for the injuries and damages caused by the negligence of Defendant **ASPLUNDH TREE EXPERT CO.**

759. At all times mentioned herein, Defendant TOWN OF HEMPSTEAD is vicariously liable for the injuries and damages caused by the negligence of Defendant ASPLUNDH TREE EXPERT CO.

760. At all times mentioned herein, Defendant COUNTY OF NASSAU is vicariously liable for the injuries and damages caused by the negligence of Defendant ASPLUNDH TREE EXPERT CO.

761. At all times mentioned herein, Defendant VERIZON NEW YORK, INC. is vicariously liable for the injuries and damages caused by the negligence of Defendant ASPLUNDH TREE EXPERT CO.

762. At all times mentioned herein, Defendant CSC HOLDINGS, LLC is vicariously liable for the injuries and damages caused by the negligence of Defendant ASPLUNDH TREE EXPERT CO.

763. At all times mentioned herein, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION is vicariously liable for the injuries and damages caused by the negligence of Defendant ASPLUNDH TREE EXPERT CO.

764. At all times mentioned herein, Defendant LONG ISLAND POWER AUTHORITY is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

765. At all times mentioned herein, Defendant ALTICE USA, INC., is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

766. At all times mentioned herein, Defendant NATIONAL GRID is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

767. At all times mentioned herein, Defendant PSEG is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

768. At all times mentioned herein, Defendant VILLAGE OF LAWRENCE is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.



769. At all times mentioned herein, Defendant TOWN OF HEMPSTEAD is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

770. At all times mentioned herein, Defendant COUNTY OF NASSAU is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

771. At all times mentioned herein, Defendant VERIZON NEW YORK, INC. is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

772. At all times mentioned herein, Defendant CSC HOLDINGS, LLC is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

773. At all times mentioned herein, Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION is responsible for the tortious acts of its agent, servant, employee and/or associate, Defendant ASPLUNDH TREE EXPERT CO.

774. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **LONG ISLAND POWER AUTHORITY** by which they operated as an agent, servant, employee and/or associate of Defendant **LONG ISLAND POWER AUTHORITY**.

775. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **NATIONAL GRID** by which they operated as an agent, servant, employee and/or associate of Defendant **NATIONAL GRID**.

776. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **PSEG** by which they operated as an agent, servant, employee and/or associate of Defendant **PSEG**.

777. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **VILLAGE OF LAWRENCE** by which they operated as an agent, servant, employee and/or associate of Defendant **VILLAGE OF LAWRENCE**.

778. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **TOWN OF HEMPSTEAD** by which they operated as an agent, servant, employee and/or associate of Defendant **TOWN OF HEMPSTEAD**.

779. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **COUNTY OF NASSAU** by which they operated as an agent, servant, employee and/or associate of Defendant **COUNTY OF NASSAU**.

780. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **VERIZON NEW YORK, INC.** by which they operated as an agent, servant, employee and/or associate of Defendant **VERIZON NEW YORK, INC.**

781. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **CSC HOLDINGS, LLC** by which they operated as an agent, servant, employee and/or associate of Defendant **CSC HOLDINGS, LLC**.

782. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION** by which they operated as an agent, servant, employee and/or associate of Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION**.

783. At all times mentioned herein, Defendant **SAMUEL SHORE** was the owner of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

784. At all times mentioned herein, Defendant **TRACY SHORE** was the owner of the property known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

785. At all times mentioned herein, Defendant **SAMUEL SHORE** was the owner of a tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

786. At all times mentioned herein, Defendant **TRACY SHORE** was the owner of a tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

787. At all times mentioned herein, Defendant **SAMUEL SHORE** operated the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

788. At all times mentioned herein, Defendant **SAMUEL SHORE** managed the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

789. At all times mentioned herein, Defendant **SAMUEL SHORE** controlled the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

790. At all times mentioned herein, Defendant **SAMUEL SHORE** supervised the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

791. At all times mentioned herein, Defendant **SAMUEL SHORE** maintained and repaired the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

792. At all times mentioned herein, Defendant **SAMUEL SHORE** was under a duty to operate, manage, control, supervise, inspect, maintain and repair the aforesaid premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

793. At all times mentioned hereinafter, Defendant **SAMUEL SHORE** was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises, specifically the tree located on 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions

constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

794. At all times hereinafter mentioned, and prior thereto, Defendant **SAMUEL SHORE** was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

795. At all times mentioned herein, Defendant **TRACY SHORE** operated the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

796. At all times mentioned herein, Defendant **TRACY SHORE** managed the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

797. At all times mentioned herein, Defendant **TRACY SHORE** controlled the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

798. At all times mentioned herein, Defendant **TRACY SHORE** supervised the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

799. At all times mentioned herein, Defendant **TRACY SHORE** maintained and repaired the aforesaid premises, and more specifically, the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

800. At all times mentioned herein, Defendant **TRACY SHORE** was under a duty to operate, manage, control, supervise, inspect, maintain and repair the aforesaid premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

801. At all times mentioned hereinafter, Defendant **TRACY SHORE** was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises, specifically the tree located on 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly



using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

802. At all times hereinafter mentioned, and prior thereto, Defendant **TRACY SHORE** was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

803. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

804. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

805. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

806. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

807. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

808. At all times mentioned herein and prior thereto, Defendant **SAMUEL SHORE** supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

809. On or about September 6, 2016, Defendant **SAMUEL SHORE** negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

810. On or about September 6, 2016, Defendant **SAMUEL SHORE** negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition

811. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

812. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

813. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

814. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

815. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

816. At all times mentioned herein and prior thereto, Defendant **TRACY SHORE** supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

817. On or about September 6, 2016, Defendant **TRACY SHORE** negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

818. On or about September 6, 2016, Defendant **TRACY SHORE** negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

819. On or about September 6, 2016 and continuing to date, Plaintiff **SEAN FINNEGAN** was caused to sustain severe and irreparable permanent personal injuries as a result of the negligence of the Defendants herein, their agents, servants, employees and/or associates, without any negligence on the part of the Plaintiff **SEAN FINNEGAN** contributing thereto.

820. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **LONG ISLAND POWER AUTHORITY** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

821. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **NATIONAL GRID** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

822. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **PSEG** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

823. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VILLAGE OF LAWRENCE** through its agents, servants, employees and/or

associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

24. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **TOWN OF HEMPSTEAD** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

825. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **COUNTY OF NASSAU** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

826. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VERIZON NEW YORK, INC.**, through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

827. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **CSC HOLDINGS, LLC** through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

828. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased,



operated, managed, maintained and/or repaired by Defendant CABLEVISION SYSTEM LONG ISLAND CORPORATION through its agents, servants, employees and/or associates came in contact with Plaintiff SEAN FINNEGAN on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

829. At all times mentioned herein, Plaintiff SEAN FINNEGAN was operating his motorcycle when the cable, telephone line (wire) managed, maintained, inspected and/or repaired by Defendant ASPLUNDH TREE EXPERT CO., through its agents, servants, employees and/or associates came in contact with Plaintiff SEAN FINNEGAN on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

830. At all times mentioned herein, Plaintiff SEAN FINNEGAN was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant LONG ISLAND POWER AUTHORITY through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant SAMUEL SHORE,

came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

831. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **NATIONAL GRID** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

832. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **PSEG** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact

with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

833. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VILLAGE OF LAWRENCE** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

834. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **TOWN OF HEMPSTEAD** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed,

maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

835. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **COUNTY OF NASSAU** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

836. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VERIZON NEW YORK, INC.**, through its agents,

servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

837. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **CSC HOLDINGS, LLC** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

838. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant

CABLEVISION SYSTEM LONG ISLAND CORPORATION through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

839. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire managed, maintained, and/or inspected by Defendant **ASPLUNDH TREE EXPERT CO.**, through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

840. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased,

operated, managed, maintained and/or repaired by Defendant **LONG ISLAND POWER AUTHORITY** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

841. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **NATIONAL GRID** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

842. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **PSEG** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

843. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VILLAGE OF LAWRENCE** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.



844. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **TOWN OF HEMPSTEAD** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

845. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **COUNTY OF NASSAU** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

846. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **VERIZON NEW YORK, INC.**, through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

847. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **CSC HOLDINGS, LLC** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

848. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **CABLEVISION SYSTEM LONG ISLAND CORPORATION** through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

849. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire managed, maintained, inspected and/or repaired by Defendant **ASPLUNDH TREE EXPERT CO.**, through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

850. At all times mentioned herein, Defendant **ALTICE** derived substantial revenue from engaging in business in the State of New York.

851. At all times mentioned herein, Defendant **ALTICE** expected or should have expected its acts, omissions and activities to have consequences within the State of New York.

852. At all times mentioned herein and prior thereto, Defendant **ALTICE** its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire to be placed on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

853. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

854. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

855. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

856. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

857. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

858. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

859. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

860. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

861. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

862. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

863. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

864. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

865. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

866. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire),



cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

867. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

868. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

869. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

870. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

871. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

872. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

873. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the

aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

874. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

875. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

876. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles

located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

877. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

878. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

879. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

880. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

881. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

882. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

883. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid

power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

884. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

885. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments caused the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles to be placed in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New.

886. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments owned the aforesaid power line (wire),

cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

887. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

888. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

889. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road,

Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

900. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

901. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

902. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments leased the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in



front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

903. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments repaired the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

904. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised repairs to the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

905. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located in front of the premises known as 315

Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

906. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

907. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

908. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

909. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

910. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

911. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

912. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State

of New York to be, become, and remain in a dangerous and defective condition.

913. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments maintained the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

914. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments managed the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

915. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments controlled the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

916. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised the aforesaid tree located

in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

917. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments inspected the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

918. At all times mentioned herein and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments supervised maintenance to the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

919. On or about September 6, 2016, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments negligently and carelessly allowed, caused and/or permitted the aforesaid tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York to be, become, and remain in a dangerous and defective condition.

920. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

921. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid premises specifically the tree located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

922. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

923. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

924. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles in front of the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

925. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles on the premises known as 315 Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.



926. At all times mentioned hereinafter, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was under a duty to operate, control, manage, maintain, repair, supervise and inspect the aforesaid downed low hanging power line (wire), cable, telephone line (wire) or similar wire on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in a safe, proper and lawful fashion, free from traps and conditions constituting a danger and menace to persons lawfully and properly using the roadways so that no person lawfully thereupon would be caused to sustain personal injuries and/or damages.

927. At all times hereinafter mentioned, and prior thereto, Defendant **ALTICE**, its agents, servants, employees, associates, agencies and/or departments was charged with the duty of complying with the Village of Lawrence Codes, Town of Hempstead Codes, County of Nassau Codes and New York Property Law.

928. At all times mentioned herein and prior thereto, Defendant **ASPLUNDH TREE EXPERT CO.**, its agents, servants, employees, associates, agencies and/or departments was an agent, servant, employee and/or associate of Defendant **ALTICE**.

929. At all times mentioned herein, Defendant **ALTICE** is vicariously liable for the injuries and damages caused by the negligence of Defendant **ASPLUNDH TREE EXPERT CO.**

930. At all times mentioned herein, Defendant **ASPLUNDH TREE EXPERT CO.** performed services pursuant to a written agreement with Defendant **ALTICE** by which they operated as an agent, servant, employee and/or associate of Defendant **ALTICE**.

931. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **ALTICE**, through its agents, servants, employees and/or associates came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

932. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **ALTICE**, through its agents, servants, employees and/or associates, was

knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **SAMUEL SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

933. At all times mentioned herein, Plaintiff **SEAN FINNEGAN** was operating his motorcycle when the power line (wire), cable, telephone line (wire) or similar wire owned, leased, operated, managed, maintained and/or repaired by Defendant **ALTICE**, through its agents, servants, employees and/or associates, was knocked down by a tree located on the premises known as 315 Marbridge Road, Lawrence, New York which is owned, managed, maintained and inspected by Defendant **TRACY SHORE**, came in contact with Plaintiff **SEAN FINNEGAN** on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York.

934. At all times hereinafter mentioned, Defendants herein, their agents, servants, employees and/or associates were careless, reckless and negligent in the ownership, operation, management, inspection, maintenance, supervision and control of the aforesaid premises more specifically the tree on the premises known

as 315 Marbridge Road, Lawrence, New York in that knowingly, and for a long and unreasonable length of time, caused and allowed the aforementioned tree to be kept in an unsafe, improper and unsuitable manner and negligently and carelessly failed to keep same free from conditions constituting a danger to persons lawfully thereat so that no person lawfully thereat, including Plaintiff **SEAN FINNEGAN** would be caused to sustain personal injuries and/or damages; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to provide Plaintiff **SEAN FINNEGAN** with a safe area to drive/ride his motorcycle; Plaintiff claims Defendants herein, through their agents, servants, employees and/or associates were negligent and careless in failing to provide adequate illumination; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous, hazardous and unsafe condition thereat; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to a dangerous and hazardous condition to be, remain and exist; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous hazardous and unsafe condition that then and there existed; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to said

tree to be, become and remain in an unsafe, hazardous and dangerous condition; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to inspect, timely inspect and/or properly inspect the aforesaid tree; Defendants herein, their agents, servants employees and/or associates negligently and carelessly failed to maintain the aforesaid tree although the Defendants herein, their agents, servants employees and/or associates had notice of or should have had notice of the unsafe conditions complained of herein; in violating statutory obligations; in negligently and carelessly violating the Health Code in such cases made and provided for; in violating Real Property Law; in causing a trap; in violating state common law; in causing and creating a dangerous and hazardous condition; in knowingly permitting said conditions to remain; in failing to take the proper and necessary steps to prevent the happening of the occurrences as herein set forth; and in otherwise being negligent and careless.

935. At all times hereinafter mentioned, Defendants herein, their agents, servants, employees and/or associates were careless, reckless and negligent in the ownership, operation, management, maintenance, supervision and control of the aforesaid power line (wire), cable, telephone line (wire) or similar wire located on Meadow Lane, approximately twenty (20) feet south of

Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in that knowingly, and for a long and unreasonable length of time, caused and allowed the aforementioned power line (wire), cable, telephone line (wire) or similar wire to be kept in an unsafe, improper and unsuitable manner and negligently and carelessly failed to keep same free from conditions constituting a danger to persons lawfully thereat so that no person lawfully thereat, including Plaintiff **SEAN FINNEGAN** would be caused to sustain personal injuries and/or damages; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to provide Plaintiff **SEAN FINNEGAN** with a safe area to drive/ride his motorcycle; Plaintiff claims Defendants herein, through their agents, servants, employees and/or associates were negligent and careless in that they failed to provide adequate illumination; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous, hazardous and unsafe condition thereat; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to a dangerous and hazardous condition to be, remain and exist; Defendants herein, their agents, servants, employees and/or associates violated state common law; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn

Plaintiff **SEAN FINNEGAN** of the dangerous hazardous and unsafe condition that then and there existed; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to said power line (wire), cable, telephone line (wire) or similar wire to be, become and remain in an unsafe, hazardous and dangerous condition; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to inspect, timely inspect and/or properly inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire; Defendants herein, their agents, servants employees and/or associates negligently and carelessly failed to maintain the aforesaid power line (wire), cable, telephone line (wire) or similar wire, although the Defendants herein, their agents, servants employees and/or associates had notice of or should have had notice of the unsafe conditions complained of herein; in violating statutory obligations; in negligently and carelessly violating the Health Code in such cases made and provided for; in violating Real Property Law; in causing a trap; in causing and creating a dangerous and hazardous condition; in knowingly permitting said conditions to remain; in failing to take the proper and necessary steps to prevent the happening of the occurrences as herein set forth; and in otherwise being negligent and careless.

936. At all times hereinafter mentioned, Defendants herein, their agents, servants, employees and/or associates were careless, reckless and negligent in the ownership, operation, management, maintenance, supervision and control of the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road and Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in that knowingly, and for a long and unreasonable length of time, caused and allowed the aforementioned cable, telephone line (wire) and poles to be kept in an unsafe, improper and unsuitable manner and negligently and carelessly failed to keep same free from conditions constituting a danger to persons lawfully thereat so that no person lawfully thereat, including Plaintiff SEAN FINNEGAN would be caused to sustain personal injuries and/or damages; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to provide Plaintiff SEAN FINNEGAN with a safe area to drive/ride his motorcycle; Plaintiff claims Defendants herein, through their agents, servants, employees and/or associates were negligent and careless in that they failed to provide adequate illumination; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff SEAN FINNEGAN of the dangerous, hazardous and unsafe condition thereat; Defendants herein, their agents, servants,



employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to a dangerous and hazardous condition to be, remain and exist; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous hazardous and unsafe condition that then and there existed; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to said power line (wire), cable, telephone line (wire) or similar wire and poles to be, become and remain in an unsafe, hazardous and dangerous condition; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to inspect, timely inspect and/or properly inspect the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles; Defendants herein, their agents, servants employees and/or associates negligently and carelessly failed to maintain the aforesaid power line (wire), cable, telephone line (wire) or similar wire and poles although the Defendants herein, their agents, servants employees and/or associates had notice of or should have had notice of the unsafe conditions complained of herein; in violating statutory obligations; in negligently and carelessly violating the Health Code in such cases made and provided for; in violating Real Property Law; in violating state common law; in causing a trap; in causing and creating a dangerous and hazardous

condition; in knowingly permitting said conditions to remain; in failing to take the proper and necessary steps to prevent the happening of the occurrences as herein set forth; and in otherwise being negligent and careless.

937. At all times hereinafter mentioned, Defendants herein, their agents, servants, employees and/or associates were careless, reckless and negligent in the ownership, operation, management, maintenance, supervision, inspection and control of the aforesaid roadway located on Meadow Lane, approximately twenty (20) feet south of Marbridge Road, Village of Lawrence, Town of Hempstead, County of Nassau and State of New York in that knowingly, and for a long and unreasonable length of time, caused and allowed the aforementioned roadway to be kept in an unsafe, improper and unsuitable manner and negligently and carelessly failed to keep same free from conditions constituting a danger to persons lawfully thereat so that no person lawfully thereat, including Plaintiff **SEAN FINNEGAN** would be caused to sustain personal injuries and/or damages; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to provide Plaintiff **SEAN FINNEGAN** with a safe area to drive/ride his motorcycle; Plaintiff claims Defendants herein, through their agents, servants, employees and/or associates were negligent and careless in that they failed to provide adequate illumination; Defendants herein, their

agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous, hazardous and unsafe condition thereat; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to a dangerous and hazardous condition to be, remain and exist; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to warn Plaintiff **SEAN FINNEGAN** of the dangerous hazardous and unsafe condition that then and there existed; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly allowed, caused, permitted and/or contributed to said roadway to be, become and remain in an unsafe, hazardous and dangerous condition; Defendants herein, their agents, servants, employees and/or associates negligently and carelessly failed to inspect, timely inspect and/or properly inspect the aforesaid roadway; Defendants herein, their agents, servants employees and/or associates negligently and carelessly failed to maintain the aforesaid roadway, although the Defendants herein, their agents, servants employees and/or associates had notice of or should have had notice of the unsafe conditions complained of herein; in violating state common law; in violating statutory obligations; in negligently and carelessly violating the Health Code in such cases made and provided for; in violating Real Property Law; in causing a trap; in causing

and creating a dangerous and hazardous condition; in knowingly permitting said conditions to remain; in failing to take the proper and necessary steps to prevent the happening of the occurrences as herein set forth; and in otherwise being negligent and careless.

938. Upon information and belief, Defendants herein, through their agents, servants, employees and/or associates had both actual and constructive notice.

939. This action falls within one or more of the exceptions set forth in Article 16 of the New York Civil Practice Laws and Rules.

940. By reason of their acts and/or omissions, the Defendants are liable, jointly and severally, for the severe personal injuries to Plaintiff **SEAN FINNEGAN**, and one or more of the exemptions set forth in §1602 of the New York Civil Practice Laws and Rules are applicable.

941. By reason of the foregoing, Plaintiff **SEAN FINNEGAN** was caused to sustain severe, permanent personal injuries, pain, suffering, loss of enjoyment of life, emotional distress, economic and pecuniary damages, and to incur expenses for medical, hospital and rehabilitative treatment. Upon information and belief, the

Plaintiff's injuries are permanent and will cause future pain, suffering, disability, loss of enjoyment of life, economic and pecuniary damages.

942. That by reason of the foregoing, the Plaintiff SEAN FINNEGAN demands all damages permitted by law.

JURY DEMAND

943. Plaintiff SEAN FINNEGAN demands a trial on all issues.

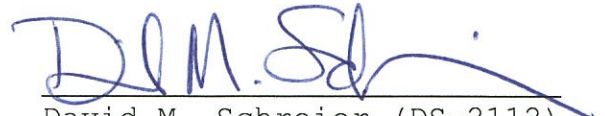
WHEREFORE, Plaintiff SEAN FINNEGAN demands judgment against Defendants LONG ISLAND POWER AUTHORITY, NATIONAL GRID ELECTRIC SERVICES LLC, NATIONAL GRID USA SERVICE COMPANY INC., NATIONAL GRID SERVICES INC., PSEG LONG ISLAND LLC (a subsidiary of Public Service Enterprise Group, Inc.), INCORPORATED VILLAGE OF LAWRENCE, TOWN OF HEMPSTEAD, COUNTY OF NASSAU, VERIZON NEW YORK, INC., CSC HOLDINGS, LLC, CABLEVISION SYSTEMS LONG ISLAND CORPORATION, ASPLUNDH TREE EXPERT CO., SAMUEL SHORE, TRACY SHORE, and ALTICE USA, INC., in the sum of \$50,000,000.00 (FIFTY MILLION DOLLARS), together with interest, costs and disbursements.

Dated: New York, New York  
July 26, 2017

Yours, etc.

SCHREIER & WACHSMAN, LLP

By:



David M. Schreier (DS-2112)  
Attorneys for Plaintiff  
Sean Finnegan  
240 Madison Avenue, 8<sup>th</sup> Floor  
New York, New York 10016  
212-889-0686